

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Weyerhaeuser NR Company  
Natchitoches Plant  
Natchitoches, Natchitoches Parish, Louisiana  
Agency Interest No. 3782  
Activity Number: PER20090005  
Proposed Permit Number: 1980-00016-V5**

**I. APPLICANT**

**Company:**

Weyerhaeuser NR Company  
234 Industrial Avenue  
Natchitoches, LA 71457

**Facility:**

Natchitoches Plant  
234 Industrial Avenue, Natchitoches, Natchitoches Parish, LA 71457  
Location: 31° 48' 9" latitude, -93° 5' 33" longitude, Coordinate Datum NAD83

**II. FACILITY AND CURRENT PERMIT STATUS**

The Natchitoches Plant produces unique laminated lumber products. During the pressing process, dry veneer is fed into a laminated lumber machine, which applies glue adhesives, stacks the veneer sheets, and hot presses the sheets together with a steam heated press producing the laminated lumber. This process generates particulate matter and VOC emissions from the pressing of the adhesive. The laminated lumber is cut to length and width with various saws. Sawdust and wood waste are generated during various stages of operation and are contained by the pneumatic vacuum system. The collected air and dust are separated with a system of cyclones, which serves to minimize the release of collected particulates into the atmosphere. Steam for heating the presses is supplied by a natural gas fired boiler.

In addition to laminated board production, wooden I-beams are also produced at the site using laminated lumber products. For this process, the laminated lumber products are glued together with web stock using a catalyst driven adhesive and then placed in a bake oven for curing. After curing, the I-beams are checked for product quality and prepared for shipping.

The plant currently operates under Permit 1980-00016-V4, dated October 6, 2008.

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### III. PROPOSED PROJECT/PERMIT INFORMATION

#### Application

A permit application dated August 24, 2009 as well as additional information dated November 2 and November 24, 2009 were submitted requesting a Part 70 operating permit modification.

#### Project

Weyerhaeuser NR Company proposes to replace the existing boiler with a new unit. The existing boiler will continue its operation until the new boiler is fully operational. This permit also includes Press 1B and the proposed heated sections for other presses. These projects were approved by previous permitting actions, but have never been constructed. The Insignificant Activities List was updated. Emissions from various sections of the plant were recalculated based on updated emissions factors and/or current operating conditions.

#### Proposed Permit

This permit (Permit 1980-00016-V5) is a modification to the existing Part 70 operating permit for the Natchitoches Plant.

#### Permitted Air Emissions (tons/year)

Pollutant	Before	After	Change
PM <sub>10</sub>	206.06	205.70	- 0.36
SO <sub>2</sub>	0.08	0.18	0.10
NO <sub>x</sub>	19.14	15.76	- 3.38
CO	40.29	12.29	- 28.00
VOC	234.18	241.07	+ 6.89
LAC 33:III Chapter 51 Regulated Toxic Air Pollutants			
Acetaldehyde	-	1.88	+ 1.88
Benzene	< 0.01	0.01	+ 0.01
Ethylene Glycol	-	0.82	+ 0.82
Formaldehyde	6.79	7.03	+ 0.24
Methanol	55.34	64.17	+ 8.83
Phenol	2.63	3.85	+ 1.22
Propionaldehyde	-	1.56	+ 1.56
Total	64.76	79.32	+ 14.56

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#### **IV REGULATORY ANALYSIS**

The applicability of the appropriate standards is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

##### **Applicability and Exemptions of Selected Subject Items**

The explanations for the non-applicability and exemptions of selected subject items are listed in Table XI of the proposed permit.

##### **Prevention of Significant Deterioration (PSD)/Nonattainment Review**

Emissions from each criteria pollutant from the plant are below the PSD major source threshold. The plant is not classified as a PSD source. PSD review is not required.

##### **Streamlined Equipment Leak Monitoring Program**

The permit does not include any Streamlined Equipment Leak Monitoring Program.

##### **MACT Requirements**

The facility is a major source of Toxic Air Pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. Most of the TAP emissions are from the resins. Limiting the plant production and TAP concentrations in resins are determined as MACT.

##### **Air Quality Analysis**

Emissions were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. The proposed project did not require the applicant to model emissions.

##### **General Condition XVII Activities**

No General Condition XVII Activities are included in the permit.

##### **Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

#### **V. PERMIT SHIELD**

This permit does not contain any permit shield.

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## **VI. PERIODIC MONITORING**

To demonstrate compliance with the permit limits and applicable standards, plant production is monitored continuously. TAP concentrations in resins are monitored periodically.

## **VII. GLOSSARY**

**Best Available Control Technologies (BACT)** - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

**CAM** - Compliance Assurance Monitoring rule - A federal air regulation under 40 CFR Part 64

**Carbon Black** - A black colloidal substance consisting wholly or principally of amorphous carbon and used to make pigments and ink.

**Carbon Monoxide (CO)** - (Carbon monoxide) a colorless, odorless gas produced by incomplete combustion of any carbonaceous (gasoline, natural gas, coal, oil, etc.) material.

**Cooling Tower** - A cooling system used in industry to cool hot water (by partial evaporation) before reusing it as a coolant.

**Continuous Emission Monitoring System (CEMS)** - The total combined equipment and systems required to continuously determine air contaminants and diluent gas concentrations and/or mass emission rate of a source effluent.

**Cyclone** - A control device that uses centrifugal force to separate particulate matter from the carrier gas stream.

**Duct Burner** - A device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

**Federally Enforceable Specific Condition** - A federally enforceable specific condition written to limit the potential to Emit (PTE) of a source that is permanent, quantifiable, and practically enforceable. In order to meet these requirements, the draft permit

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containing the federally enforceable specific condition must be placed on public notice and include the following conditions:

- A clear statement of the operational limitation or condition which limits the source's potential to emit;
- Recordkeeping requirements related to the operational limitation or condition;
- A requirement that these records be made available for inspection by LDEQ personnel;
- A requirement to report for the previous calendar year.

**Grandfathered Status-** Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

**Heat Recovery Steam Generator (HRSG)** - A steam generator that recovers exhaust heat from a gas turbine, and provides economizing and steam generation surfaces.

**Hydrogen Sulfide (H<sub>2</sub>S)** - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

**Maximum Achievable Control Technology (MACT)** - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

**NESHAP** - National Emission Standards for Hazardous Air Pollutants - Air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63

**Nitrogen Oxides (NO<sub>x</sub>)** - Compounds whose molecules consists of nitrogen and oxygen.

**Nonattainment New Source Review (NNSR)** - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

**NSPS** - New Source Performance Standards - Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60

**Organic Compound** - Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)